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April 13, 2016

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Via ECF

Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 240
New York, New York 10007

Re: *Clearlake Shipping Pte Ltd. v. O.W. Bunker (Switzerland) SA, et al.*,
U.S.D.C., S.D.N.Y., Docket No. 14 Civ. 9287 (VEC)

Nippon Kaisha Line Limited v. O.W. Bunker USA Inc, et al.,
U.S.D.C., S.D.N.Y., Docket No. 14 Civ. 10091 (VEC)

Dear Judge Caproni:

We are attorneys for the interpleader plaintiffs in the above-captioned actions, Clearlake Shipping Pte Ltd. and Nippon Kaisha Line Limited. The above-captioned actions were designated by Your Honor as two of four “test cases” in the related O.W. Bunker interpleader actions for briefing on summary judgment and discharge issues.

We respectfully refer Your Honor to the recent filing of counsel for Hapag-Lloyd in the other two selected test cases, Case Nos. 14-cv-9949 and 15-cv-6718. A copy of the letter filed by Hapag-Lloyd is attached hereto as Exhibit A for reference (14-cv-9949 Dkt. 209). In its letter, counsel for Hapag-Lloyd submits a joint request by the parties to the test cases to extend the Court-ordered briefing schedule by one week so that the following deadlines apply to summary judgment and discharge briefing:

Motions shall be due May 13, 2016;
Opposition briefs shall be due June 10, 2016; and
Reply briefs shall be due July 13, 2016

For the sake of good order, we submit this letter to reiterate the extension request with respect to all of the test cases, including Case Nos. 14-cv-9287 and 14-cv-10091. As noted in Hapag-Lloyd’s letter, no party has objected to this request with respect to any of the test cases.

We thank the Court for its attention to these matters.

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Respectfully submitted,



Marie E. Larsen

cc: Via ECF to all counsel of record

#40473383_v1

EXHIBIT A

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April 12, 2016

Our Ref: 482-1402/MF/GMV

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Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

Re: *Hapag-Lloyd Aktiengesellschaft v. U.S. Oil Trading,*
14-cv-9949(VEC)

- and -

U.S. Oil Trading v. M/V VIENNA EXPRESS,
15-cv-6718 (VEC) (related action)

Dear Judge Caproni,

We represent Hapag-Lloyd in the referenced matters, which have recently been designated as "test cases" in the related interpleader cases. We are writing to request a one-week extension of the briefing deadlines set in the test cases. The attorneys involved in the related test cases join in this request, and no party in any of the other cases objects to this request.¹

The reason for the request is that there is a significant maritime law international conference in New York during the week of May 1 through and including the night of May 6. The event involves the annual meeting of the U.S. Maritime Law Association which is being held this year in conjunction with the 42nd International Conference of the Comité Maritime International ("CMI"). A number of the lawyers involved in these cases, including the

¹ We canvassed the entire group and also provided a copy of this letter to everyone to determine if there is any objection to this request, and those that have responded have indicated their agreement to the request and this letter. No party has objected.

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undersigned, are responsible for holding committee meetings with the International Working Groups and otherwise having to attend several functions and meetings. Accordingly, the parties would appreciate if the briefing deadlines were adjusted by roughly an additional week such that the following deadlines will apply:

Motions shall be due May 13, 2016;
Opposition briefs shall be due June 10, 2016 and
Reply briefs shall be due July 13, 2016.²

We thank the Court for its time and consideration to this request.

Respectfully,

FREEHILL, HOGAN & MAHAR LLP

/s/ Gina M. Venezia

Gina M. Venezia

GMV:clc

cc: All counsel

² The one week extension of this deadline would be July 8, but because of the intervening July 4 holiday, we are requesting until July 13.